

REMARKS

1. Summary of Office Action

In the Office Action mailed on March 3, 2008, the Examiner objected to the drawings as failing to include reference characters. The Examiner objected to claims 12-13, 17, and 21 due to lack of antecedent basis. The Examiner rejected claims 1, 16, 24-26, 39, 37-38, and 42 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent App. Pub. No. 2002/0165969 ("Gallant"). The Examiner rejected claims 4, 30, and 31 under 35 U.S.C. § 103(a) as being unpatentable over Gallant and further in view of U.S. Patent App. Pub. No. 2004/0190498 ("Kallio"). The Examiner rejected claims 3,5, 11-14, 17-23, 27, 34-36, 39-41, and 43-49 under 35 U.S.C. § 103(a) as being unpatentable over Gallant and further in view of U.S. Patent No. 7,170,863 ("Denman"). The Examiner rejected claims 2, 6-7, and 9-10 under 35 U.S.C. § 103(a) as being unpatentable over Gallant and further in view of U.S. Patent App. Pub. No. 2004/0073685 ("Hedin").

A response was submitted to the March 3, 2008 office action on June 10, 2008. In response, the Office issued a notice of non-compliant amendment on June 18, 2008 indicating the cancellation of claim 4 was non-compliant.

2. Status of the Claims

Pending are claims 1-29 and 32-49, of which claims 1, 29, and 43 are independent claims, and the remainder are dependent. In this response, claims 1-21, 24, 27-29, and 32-43 have been amended and claims 30 and 31 have been cancelled. The amendments to the claims are supported by the specification as filed generally and, as such, do not introduce new matter. The amendments to the claims are made without prejudice or disclaimer, and solely for the purposes of expediting prosecution. The Applicants expressly reserve the right to pursue the subject matter of the previous claims in a continuation application.

3. Response to the Notice of Non-Compliant Amendment of claim 4.

In this response, Applicant has amended claim 4 and has changed the status indicator to indicate claim 4 is currently amended, not cancelled. Applicant therefore requests the objection to claim 4 as having a non-compliant amendment be withdrawn.

4. Objections to the Drawings and Amendments to the Specification

In the Office Action, the Examiner objected to Figure 6 for failing to comply with 37 C.F.R. § 1.84(p)(5) because the reference numbers 66a and 66d were not mentioned in the specification. The drawings were also objected to because Figure 6 included reference number 66 which was not mentioned in the specification.

In response, paragraphs [0044] and [0046] have been amended. Paragraph [0044] is amended to change the term "push-to-talk session manager 66a" to "push-to-talk server 66." Paragraph [0046] is amended to change the term "push-to-talk media processor 66d" to "push-to-talk server 66." Applicant submits that these amendments to the specification are supported by the specification and drawings as filed, and as such, do not introduce new matter. Based upon these amendments to the specification, Applicant submits that the drawings now comply with the requirements of 37 CFR § 1.84(p)(5) and amendments to the drawings are no longer required.

4. Response to Claim Rejections and Objections

a. Claims 12, 13, 17, and 21 have been amended to correct the lack of antecedent basis.

Claims 12, 13, 17, and 21 were objected to under 35 C.F.R. § 1.75(d)(1) as having a lack of antecedent basis. In this response, Applicant has amended claims 12, 13, 17, and 21 to correct the lack of antecedent basis. As such, Applicant requests the Examiner withdraw the objections under 35 C.F.R. § 1.75(d)(1) to claims 12, 13, 17, and 21.

b. Claim 1, as amended, is not anticipated by Gallant. Further, the other cited art does not disclose all of the limitations recited by amended claim 1.

Claim 1 was rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Gallant. Applicant submits amended claim 1 is not anticipated by Gallant and further, the subject matter recited in claim 1 is not recited by the other references cited by the Examiner.

In this response, Applicant has amended claim 1 to recite use of three SIP proxies: (i) a first SIP proxy supporting routing of communications for a first plurality of clients in the first region, (ii) a second SIP proxy supporting routing of communications for a second plurality of clients in the second region, and (iii) a third SIP proxy supporting routing of communications between the first SIP proxy

and the second SIP proxy. Support for these amendments may be generally found throughout the specification and specifically found in at least Figure 2 (showing the three proxy arrangement recited in claim 1), and in at least paragraphs 0024 and 0035-0036.

Gallant describes a technique whereby parties accessible through a communications system may be referenced by multiple symbolic names. Gallant, Abstract. A user ("user A") of Gallant's system accesses a terminal, specifies a user to be reached ("user B"), and then the terminal sends a SIP INVITE message to a proxy server. Gallant, ¶ 0067. The proxy server forwards the request to a location server to retrieve contacts where user B may be reached. Gallant, ¶ 0068. The location server may disallow the session or allow the session by returning a list of contacts for user B. Gallant, ¶ 0069-0070. The proxy server may then try to contact user B at the contacts in the list of contacts. Gallant, ¶ 0071.

However, Applicant submits Gallant does not teach use of multiple SIP proxies. Applicant further submits that Gallant does not disclose or suggest the use of multiple SIP proxies for routing as well, much less the other limitations of amended claim 1. Also, Applicant submits that Kallio does not disclose or suggest the use of multiple SIP proxies, much less the other limitations of amended claim 1.

Further, while Denman discloses an IMS proxy server, Denman does not explicitly disclose the use of multiple IMS proxy servers, much less the other limitations of amended claim 1. *For example*, see Denman, col. 10, line 19 – col. 11, lines 15 (describing Figure 2, where the IMS proxy server is introduced) and col. 13, lines 58-67 (describing Figure 4) and Figures 5-12 (call flows all indicating one IMS proxy server).

Hedin describes methods for providing transparent communication session setup and control for communications session involving different communication capabilities. Hedin, Abstract. Hedin describes a proxy apparatus that receives a request for a communication session from a first subscriber, using a first group of terminals, to a second subscriber, using a second group of terminals. Hedin, ¶ 0060-0061. The proxy apparatus sets up terminal subsessions between the groups of terminals according to the available types of communications. Hedin, ¶ 0063. Hedin shows the proxy apparatus controlled by a controller linked to a profile database, a gatekeeper, a voice gateway, and a network access server. Hedin, Figs. 3-4, and ¶ 0070-0071. Figure 10 of Hedin shows three separate network domains (GSM, UMTS, and LAN) connected by a pair of proxy

apparatuses. Hedin, Figure 10 and ¶ 0095.

Figure 10 of Hedin and the accompanying description in ¶ 0092-107 of Hedin does not show or otherwise indicate a proxy apparatus routing between proxy apparatuses. In contrast, claim 1 recites, *inter alia*, “a third SIP proxy supporting routing of communications between the first SIP proxy and the second SIP proxy.” Also see Applicant’s Figure 2, showing message flows between regions 20 and 23 via SIP proxy 11 and ¶ 0035-0036. As such, Hedin does not disclose or suggest the limitations recited in amended claim 1.

Therefore, Applicant submits that none of the cited art references disclose or suggest the subject matter recited in amended claim 1, and thus, claim 1 is allowable.

c. Claim 29 recites routing of SIP messages between SIP proxies and is therefore allowable over the cited art for at least the same reasons as claim 1.

Claim 29 was rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Gallant. Applicant submits amended claim 29 is not anticipated by Gallant and further, the subject matter recited in claim 29 is not disclosed by the art cited by the Examiner.

Amended claim 29 recites, *inter alia*, (i) receiving at a third SIP proxy, a SIP message from the first client, via a first SIP proxy, destined for a second client located in a second region, (ii) determining a second SIP proxy serving the second client; and (iii) routing the SIP message to the second SIP proxy. Support of these amendments may be found generally throughout the specification and specifically by at least Figure 2 and paragraphs 0025 and 0036-0037 of the specification. As such, no new matter was introduced by these amendments to claim 29.

Claim 29 recites routing of SIP messages between two SIP proxies by a third SIP proxy. As discussed above for claim 1, routing of communications between two SIP proxies is not disclosed or suggested by the cited art. Therefore, for at least the reasons provided for claim 1, claim 29 is allowable.

d. Claim 43 as amended is allowable over the cited art, as neither Gallant nor Denman disclose use of a SIP message with both a telecommunications URI and a SIP URI.

Claim 43 was rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Gallant in view of Denman. Applicant submits amended claim 43 is not suggested or disclosed by Gallant or Denman and such, is allowable over the cited art.

Claim 43 was amended to recite, *inter alia*, "a SIP message to the SIP proxy containing a SIP uniform resource identifier and a telecommunications uniform resource identifier for the push-to-talk client." Support for the this amendment may be found generally throughout the specification and specifically in at least paragraph 0032 of the specification and, as such, no new matter was introduced by the amendments to claim 43.

In the Office Action, the Examiner states that Gallant does not explicitly disclose use of differing identifiers that have a SIP uniform resource identifier (URI) format and a TEL URI format. See Office Action, page 7. While Gallant discloses use of an alias table with multiple identifiers as part of an alias mapping scheme (Gallant, ¶ 0073), Applicant submits Gallant does not disclose or suggest use of **messages** with two identifiers, such as the SIP URI and the telecommunications URI recited in claim 43. Applicant therefore submits that Gallant does not disclose or suggest a SIP message to the SIP proxy containing a SIP uniform resource identifier and a telecommunications uniform resource identifier for the push-to-talk client, as recited in claim 43.

Denman does not cure the deficiencies of Gallant. Denman discloses a system to provide push-to-talk form one user to another in a wireless packet data telecommunications network. Denman, Abstract. Denman also discloses use of SIP signaling by a proxy server, including use of a SIP Uniform Resources Locator to address a client. Denman, col. 10, lines 33-39 and col. 11, lines 8-9. However, Applicants submit Denman does not disclose use of a telecommunications URI or use of messages with a telecommunications URI and a SIP URI, much less use of "a SIP message to the SIP proxy containing a SIP uniform resource identifier and a telecommunications uniform resource identifier for the push-to-talk client" as recited in claim 43. Therefore, claim 43 is not unpatentable over Gallant in view of Denman, and as such, is allowable.

Further, Applicant submits that each of the dependent claims is allowable for at least the reason that it depends from one of the allowable independent claims. There may be other reasons for patentability for independent claims 1, 29, and 43 and the dependent claims. Applicant does not waive those arguments by failing to assert them here.

4. Conclusion

Applicant submits that the present application is in condition for allowance and notice to that effect is hereby requested. Applicant expressly reserves the right to make further argument regarding patentability of the claims in future proceedings.

Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at (312) 913-3338.

Respectfully submitted,

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